

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (SN) ECF Case
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This document relates to:

Lloyd A. Abel et al v. Islamic Republic of Iran, No. 1:18-cv-11837 (GBD) (SN)

Jerry S. Goldman, Esq., hereby states under penalty of perjury that:

1. I am an attorney representing the *Abel* plaintiffs in the above-captioned litigation, and I submit this declaration in support of the Motion for Corrections to Order of Judgment against the Islamic Republic of Iran (“Iran”) on behalf of Mercedes Concepcion and Kirsy Concepcion Salazar.

2. The source of my information and the basis for my belief in my statements contained herein are my personal involvement in this matter; my firm’s representation of the *Abel* plaintiffs in connection with the September 11th litigation against the terror defendants; other court records relating to the multi-district litigation to which the *Abel* plaintiffs are parties; conversations had with family members to the *Abel* plaintiffs; file records; and conversations with counsel to other September 11th plaintiffs. Any matters about which I lack personal knowledge are asserted herein upon information and belief.

3. This Declaration and the attached Proposed Order and modified Exhibits are submitted in light of notice we received that two individual plaintiffs included in our August 15, 2019 Motion for Final Damages Judgment (ECF No. 4872), which was granted on September 3, 2019 (ECF No. 5048), were not U.S. nationals on September 11, 2001.

4. Plaintiffs' counsel incorrectly surmised that they possessed U.S. citizenship documents for Mercedes Concepcion who appears on line 52 of Exhibit A to ECF No. 5048 and Kirsy Concepcion Salazar who appears on line 53 of Exhibit A to ECF No. 5048.

5. Given that Ms. Concepcion and Ms. Concepcion Salazar were not United States nationals on September 11, 2001, we ask that the judgments for Mercedes Concepcion and Kirsy Concepcion Salazar be vacated and that the Clerk remove Mercedes Concepcion and Kirsy Concepcion Salazar from the Judgment Index as they are not entitled to the relief that was awarded at the present time subject to their furnishing to counsel sufficient citizenship documentation rendering them eligible for a judgment pursuant to 28 U.S.C. § 1605A.

Dated: New York, New York
August 4, 2020

/s/ Jerry S. Goldman
Jerry S. Goldman, Esq.